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memorandum

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DATE: MAY 13 1992
REPLY TO: EM-453 (A. Rampertaap, 3-8191)
ATTN OF:

SUBJECT: Rocky Flat Responses to Regulator and Department of Energy Comments on the
Final Phase I Resource Conservation and Recovery Act Facility
Investigation/Remedial Investigation Work Plan for Operable Unit 9

TO: Frazer Lockhart, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453) has analyzed the responses by Rocky Flats (RF) to comments made by Environmental Protection Agency, Colorado Department of Health and Department of Energy (DOE) on the subject document. Generally, we are concerned about the lack of integration in sampling efforts for Operable Unit (OU) 9 (Original Process Waste Lines) with other OUs, as indicated by RF responses. In responsibly managing its Environmental Restoration program, DOE should minimize duplicative sampling efforts.

In addition, we note from RF's responses that the Environmental Evaluation (EE) for OU 9 may be completely rewritten. Given that RF's response to many comments on the original EE was that insufficient time prevented incorporating those comments, this rewrite may be the opportunity to address these points. EM-453 would like to review the EE Work Plan for the concerns expressed in this analysis before it is sent to the regulators.

If you have any questions regarding this analysis, please contact me at FTS 301-903-8191.

Autar Rampertaap

Autar Rampertaap
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs
Environmental Restoration

Attachment

cc w/o attachment:
R. Greenberg, EM-453
J. Hartman, RF
B. Magee, HAZWRAP

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20-8

ROCKY FLATS/ALBUQUERQUE PRODUCTION DIVISION REVIEW OF
ROCKY FLATS' RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY, COLORADO
DEPARTMENT OF HEALTH, AND DEPARTMENT OF ENERGY COMMENTS ON
THE FINAL PHASE IRCRA FACILITY INVESTIGATION/REMEDIAL INVESTIGATION WORK PLAN FOR
OPERABLE UNIT NO. 9 (ORIGINAL PROCESS WASTE LINES) ROCKY FLATS PLANT

GENERAL COMMENTS:

1. A concern expressed repeatedly on Rocky Flats Plant (RFP) Operable Units (OUs) Work Plans is that the plans do not incorporate the sampling efforts of other OUs. In this review a comment is made in this area (specific comment 9, page (p.) 26). The response to this comment was "The OU-9 Field Sampling Plan (FSP) is consistent with the current approach of preparing FSPs independently for RFP OUs without considering integrations with other OUs." This statement verifies that the management philosophy is not to integrate the sampling plans of the operable units. Failure to integrate the sampling plans will result in the collection of redundant data. The lack of an integrated sampling plan also suggests that data will not be shared between the various operable units, potentially resulting in additional investigations that are unnecessary. Because of the relatively small size of the RF area, and the fact that most of the sixteen operable units overlap geographically, an integrated approach is a necessity to control costs. This concern should be addressed at the Program Management level, as individual authors should not modify the management approach without guidance to do so.